

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

04 CR

10001 RGS

) CRIMINAL NO.

UNITED STATES OF AMERICA

) VIOLATIONS:

(1) MARCOS PITH DEOLIVEIRA ROCHA  
a/k/a LUCAS VALADARES

and

(2) ARI ALVES TEIXEIRA

) 18 U.S.C. §1028(a)(1) and  
(b)(1)  
Producing False Identification  
Documents

) 18 U.S.C. §1028(a)(2) and  
(b)(1)

Transferring False  
Identification Documents

) 18 U.S.C. §1028(a)(5) and  
(b)(1)

Possession of Document-Making  
 Implements for Production of  
 False Identification Documents

) 18 U.S.C. § 2

) Aiding and Abetting

) 18 U.S.C. §1028(b)(5),

) 18 U.S.C. §982(a)(2)(B),

) 18 U.S.C. §981(a)(1)(C), and

) 28 U.S.C. §2461(c)

) Criminal Forfeiture

INDICTMENT

COUNT ONE: (18 U.S.C. §1028(a)(1) and (b)(1) - Producing  
False Identification Documents)

The Grand Jury charges that:

On or about November 19, 2003, at Quincy, in the District of  
Massachusetts,

**MARCOS PITH DEOLIVEIRA ROCHA  
a/k/a LUCAS VALADARES  
and  
ARI ALVES TEIXEIRA,**

defendants herein, did knowingly produce false United States identification documents, to wit: four counterfeit Social Security Administration account number cards and four counterfeit alien registration card, which appeared to be issued by or under the authority of the United States, knowing that such documents were produced without lawful authority.

All in violation of Title 18, United States Code, Section 1028(a)(1) and (b)(1), and Title 18, United States Code, Section 2.

**COUNT TWO:**      **(18 U.S.C. §1028(a)(2) and (b)(1) - Transfer False Identification Documents)**

The Grand Jury charges that:

On or about November 19, 2003, at Quincy, in the District of Massachusetts,

**MARCOS PITH DEOLIVEIRA ROCHA  
a/k/a LUCAS VALADARES  
and  
ARI ALVES TEIXEIRA,**

defendants herein, did knowingly transfer false United States identification documents, to wit: four counterfeit Social Security Administration account number cards and four counterfeit alien registration card, which appeared to be issued by or under the authority of the United States, knowing that such documents were produced without lawful authority.

All in violation of Title 18, United States Code, Section 1028(a)(2) and (b)(1), and Title 18, United States Code, Section 2.

**COUNT THREE:** (18 U.S.C. §1028(a)(1) and (b)(1) - Produce False Identification Documents)

The Grand Jury further charges that:

On or about December 11, 2003, at Quincy, in the District of Massachusetts,

**MARCOS PITH DEOLIVEIRA ROCHA  
a/k/a LUCAS VALADARES  
and  
ARI ALVES TEIXEIRA,**

defendants herein, did knowingly produce false United States identification documents, to wit: six counterfeit Social Security Administration account number cards and six counterfeit alien registration card, which appeared to be issued by or under the authority of the United States, knowing that such documents were produced without lawful authority.

All in violation of Title 18, United States Code, Section 1028(a)(1) and (b)(1), and Title 18, United States Code, Section 2.

**COUNT FOUR:**      **(18 U.S.C. §1028(a)(2) and (b)(1) - Transferring  
False Identification Documents)**

The Grand Jury further charges that:

On or about December 11, 2003, at Quincy, in the District of Massachusetts,

**MARCOS PITH DEOLIVEIRA ROCHA  
a/k/a LUCAS VALADARES  
and  
ARI ALVES TEIXEIRA,**

defendants herein, did knowingly transfer false United States identification documents, to wit: six counterfeit Social Security Administration account number cards and six counterfeit alien registration card, which appeared to be issued by or under the authority of the United States, knowing that such documents were produced without lawful authority.

All in violation of Title 18, United States Code, Sections 1028(a)(2) and (b)(1), and Title 18, United States Code, Section 2.

**COUNT FIVE:**      **(18 U.S.C. §1028(a)(1) and (b)(1) - Producing False Identification Documents)**

The Grand Jury charges that:

On or about December 17, 2003, at Quincy, in the District of Massachusetts,

**MARCOS PITH DEOLIVEIRA ROCHA  
a/k/a LUCAS VALADARES  
and  
ARI ALVES TEIXEIRA,**

defendants herein, did knowingly produce false United States identification documents, to wit: two counterfeit Social Security Administration account number cards and two counterfeit alien registration card, which appeared to be issued by or under the authority of the United States, knowing that such documents were produced without lawful authority.

All in violation of Title 18, United States Code, Section 1028(a)(1) and (b)(1), and Title 18, United States Code, Section 2.

**COUNT SIX:**      **(18 U.S.C. §1028(a)(2) and (b)(1) - Transferring  
False Identification Documents)**

The Grand Jury further charges that:

On or about December 17, 2003, at Quincy, in the District of Massachusetts,

**MARCOS PITH DEOLIVEIRA ROCHA  
a/k/a LUCAS VALADARES  
and  
ARI ALVES TEIXEIRA,**

defendants herein, did knowingly transfer false United States identification documents, to wit: six counterfeit Social Security Administration account number cards and six counterfeit alien registration card, which appeared to be issued by or under the authority of the United States, knowing that such documents were produced without lawful authority.

All in violation of Title 18, United States Code, Sections 1028(a)(2) and (b)(1), and Title 18, United States Code, Section 2.

**COUNT SEVEN:** (18 U.S.C. §1028(a)(5) and (b)(1) - Possession of Document-Making Implements for Production of False Identification Documents)

The Grand Jury charges that:

On or about December 17, 2003, at Quincy, in the District of Massachusetts,

**MARCOS PITH DEOLIVEIRA ROCHA  
a/k/a LUCAS VALADARES  
and  
ARI ALVES TEIXEIRA,**

defendants herein, did knowingly possess a document-making implement, to wit a computer, and a printer/scanner/copier, with the intent that such document-making implements be used in the production of false United States identification documents.

All in violation of Title 18, United States Code, Section 1028(a)(5) and (b)(1), and Title 18, United States Code, Section 2.

COUNT EIGHT: (18 U.S.C. §1028(b)(5), 18 U.S.C. §982(a)(2)(B)  
18 U.S.C. §981(a)(1)(C), 28 U.S.C. §2461(c) -  
Criminal Forfeiture)

As a result of committing one or more of the false identification document offenses alleged in Counts One through Seven of this Indictment,

MARCOS PITH DEOLIVEIRA ROCHA  
a/k/a LUCAS VALADARES  
and  
ARI ALVES TEIXEIRA,

defendants herein, shall forfeit to the United States: (1) any personal property used or intended to be used to commit the offense, pursuant to Title 18, United States Code, Section 1028(b)(5); (2) any property constituting, or derived from, proceeds obtained directly or indirectly, as the result of one or more of the offenses, pursuant to Title 18, United States Code. Section 982(a)(2)(B); and (3) any property, real or personal, which constitutes or is derived from proceeds traceable to one or more of the offenses, pursuant to Title 18, United States Code. Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c). Such property includes, but is not limited to, the following assets seized from Apartment 1, 58 Copeland Street, Quincy, Massachusetts on or about December 17, 2003:

- a. Any and all equipment including, but not limited to, computers, including an HP Pavilion Central Processing Unit, and printers/scanners/copiers,

including an HP PSC 2175; and

b. Approximately \$2,000 in United States currency.

2. If any of the property described above, as a result of any act or omission by the defendants --

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty,

it is the intention of the United States, pursuant to Title 18, United States Code, Sections 1028(g) and/or 982(b)(1) and/or Title 28, United States Code, Section 2461(c), all of which incorporate Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property described above.

All pursuant to Title 18, United States Code, Sections 981, 982 and 1028, and Title 28, United States Code, Section 2461.

A TRUE BILL

Edward Murphy 1/7/04

FOREPERSON OF GRAND JURY

Seth P. Berman

Seth P. Berman  
Assistant U.S. Attorney

DISTRICT OF MASSACHUSETTS, Boston, January 7, 2004.

Returned into the District Court by the Grand Jurors and filed.

Tina Affsa  
Deputy Clerk  
1-7-04 at 11:45 am